

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X (ECF)

MARGARET DOLSON,

**NOTICE OF MOTION**

Plaintiff,

-against-

**Docket No.:**  
**05 Civ 2204 (CM)**

VILLAGE OF WASHINGTONVILLE,  
STEPHEN PASCAL, CHIEF OF POLICE,  
sued in his individual capacity,

Defendants.

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**PLEASE TAKE NOTICE**, that upon the annexed Affirmation of **CYNTHIA DOLAN, ESQ.**, Memorandum of Law, and upon all pleadings and proceedings had heretofore herein, the undersigned moves this Court before the Honorable Colleen McMahon at the United States District Court, Southern District of New York, 300 Quarropas Street, White Plains, New York, for an order pursuant to the Fed.R.Civ.P., Rule 56(c) granting the defendant **STEPHEN PASCAL, CHIEF OF POLICE**, summary judgment on the issue of qualified immunity, and dismissing the plaintiff's complaint against the defendant, together with such other and further relief as the Court may deem just and appropriate under the circumstances herein.

**PLEASE TAKE FURTHER NOTICE**, that answering Affirmations, if any, must be served upon the undersigned two weeks from date of receipt of this motion.

DATED: White Plains, New York  
March 16, 2005

Yours etc.,

S/  
BY: CYNTHIA DOLAN, ESQ.  
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& CORDE, P.C.  
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TO: LAW OFFICE OF MICHAEL H. SUSSMAN  
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